

State of California  
Regional Water Quality Control Board  
San Diego Region

EXECUTIVE OFFICER SUMMARY REPORT  
June 10, 2004

ITEM: 15

SUBJECT: Waste Discharge Requirements: Lake Cuyamaca Recreation and Park District, Lake Cuyamaca Public Recreation Area, Southeast of Julian, San Diego County (Tentative Order No. R9-2004-0015) (*Bryan Ott*)

PURPOSE: To adopt waste discharge requirements for the treatment and disposal of sewage via septic system and subsurface disposal leach field infiltration system.

PUBLIC NOTICE: The June 10, 2004 Regional Board meeting agenda notice that was sent on May 28, 2004 served as the required 10-day official public notification for this action. Tentative drafts of the Order, including the draft monitoring and reporting program (M&RP), were mailed on May 10, 2004 to the discharger and all known interested parties and agencies for review and comment. Copies of the tentative Order and M&RP have been made available for public review at the San Diego Regional Water Quality Control Board office.

DISCUSSION: On October 31, 2001, the Lake Cuyamaca Recreation and Park District (hereinafter discharger) submitted to this Regional Board an incomplete Report of Waste Discharge (RWD) prepared by Kennedy/Jenks Consultants for a proposed septic tank with a subsurface disposal leach field infiltration system. Additional documentation to complete the RWD was submitted through May 6, 2004 including evidence of compliance with the California Environmental Quality Act (CEQA). The discharger filed a notice of determination with the County Recorder's office on February 3, 2004. The Notice of Determination indicated that, based on the findings of the Negative Declaration prepared for the project, the project will not have a significant impact on the environment.

The RWD indicates that wastewater generated from the south and north shore facilities, which include a restaurant, public

restrooms, and fish cleaning stations, will be collected in holding tanks located in those areas, pumped out as needed, and transported by truck to the proposed waste disposal system in the San Diego Region. The proposed waste disposal system consists of an 8,000-gallon surge tank, an 8,000-gallon septic tank, and a subsurface disposal leach field infiltration system. Land is available for a reserve leach field in accordance with County of San Diego requirements. The proposed leach field site begins approximately 850 feet northwesterly of the intersection of Highway 79 and Sunrise Highway (Route S-1) and extends approximately 800 feet to the north. Sited at the approximate elevation of 4,775 feet, the system is located more 1,500 feet from the northernmost high water line of Lake Cuyamaca, a recreational and municipal water supply reservoir, and 50 feet higher than the high water level (spillway elevation). The leach line disposal system site slopes vary from 10 to 20% toward Highway 79.

The discharger owns and will operate the septic system and subsurface disposal leach field infiltration system, which has been designed to treat a maximum of 8,000 gallons per day. Treated effluent is to be discharged in the Boulder Creek Hydrologic Area Hydrologic Area (HA 907.40) of the San Diego River Hydrologic Unit (HU 907.00).

The effluent specifications contained in Tentative Order No. R9-2004-0015 for the discharge of treated wastewater to the land were developed using water quality data supplied in the RWD and the assessment of available assimilative capacity of the soil and groundwater such that groundwater would not exceed Basin Plan water quality objectives.

The RWD indicates that recreational vehicles (RV) holding tank wastes are present in the wastewater to be discharged to the subsurface disposal system. Chemical preservatives in RV holding tanks pose a significant threat to water quality. Chemicals, such as formaldehyde, formalin, and para-dichlorobenzene, undermine the septic system treatment process by destroying bacteria used to treat and degrade the domestic waste, rendering the wastewater treatment system ineffective. Furthermore, these chemicals are not readily removed in the subsurface biological treatment process and thus could be transported to the groundwater and surface waters in the vicinity of the discharge. Due to the proximity of the proposed disposal facility to a water supply reservoir (Lake Cuyamaca) and the potential for these chemicals to adversely affect both surface

and ground water quality, the discharge of RV holding tank waste to the septic tank and leach line systems would be prohibited by this Order.

The discharger has indicated that the leach field is designed with the capability to change between distribution lines to prevent over saturation and ponding and that they will work closely with the Regional Board to develop a ground water monitoring program to determine compliance and track any downstream migration of potential pollutants.

Several citizens residing near the proposed disposal site have raised a number of concerns about the project and its potential impacts to the community and the environment. It should be noted that 2,100 acres of land, known as the Tulloch Ranch, which is on the northern edge of the Cuyamaca Reservoir, was purchased by the Nature Conservancy via a loan from the State Water Resources Control Board on January 16, 2002 to protect the watershed from degradation (see supporting documents 3 and 4). The Nature Conservancy was unable to purchase the 37.47-acre site where the discharger has proposed to construct the septic tank and subsurface disposal leach field infiltration system.

The discharger petitioned the County of San Diego Board of Supervisors for cancellation of the Williamson Act Contract on the 37.47-acre parcel of land it had acquired for wastewater disposal purposes. On April 21, 2004 the County of San Diego Board of Supervisors unanimously voted to cancel the Williamson Act on the discharger's parcel of land per its request. Under a Williamson Act contract, the land can be designated as an agricultural preserve, thus disallowing any public improvements to be made as long as the land is under contract. A Williamson Act contract is an enforceable restriction pursuant to Article XIII, Section B of the California Constitution and Section 51252.

Comments on the tentative Order have been received. Staff currently is reviewing the comments, and responses to the comments will be sent to the discharger and interested parties prior to the June 10 meeting. If necessary, an errata sheet will be prepared containing any proposed revisions to the tentative Order in response to the comments received as well as additions and clarifications from staff. The errata sheet, if prepared, will be provided with the second mailing.

LEGAL CONCERNS: None.

SUPPORTING DOCS:

1. Site Map
2. Tentative Order No. R9-2004-0015 including Monitoring and Reporting Program No. 2004-0015 with transmittal letter.
3. Letter from The Nature Conservancy dated October 25, 2002.
4. News article dated February 6, 2002.
5. USEPA Inventory of Injection Wells form.
6. Notice of removal of Williamson Act Contract.
7. Notice of Negative Declaration filed on February 3, 2004.

RECOMMENDATION: Staff has considered the existence of underlying fractured bedrock of the site, the proximity of the disposal site to Lake Cuyamaca, and the potential for RV holding tank chemical wastes entering the disposal system that could result in contamination of the Lake and groundwater underlying the treatment system. Tentative Order No. R9-2004-0015 addresses these concerns and contains adequate requirements to protect water quality.

Adoption of Tentative Order No. R9-2004-0015 is recommended.